

**EXHIBIT 23**  
**FILED UNDER SEAL**

Contains Confidential Portions  
Attorneys' Eyes Only

Page 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

HUAWEI TECHNOLOGIES CO, LTD, Case No.  
HUAWEI DEVICE USA, INC., and 16-cv-02787-WHO

HUAWEI TECHNOLOGIES USA, INC.,  
Plaintiffs/Counterclaim Defendants,

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG RESEARCH AMERICA, INC.,  
Defendants/Counterclaim Plaintiffs,

and

SAMSUNG RESEARCH AMERICA, INC.,  
Defendant,

v.

HISILICON TECHNOLOGIES CO., LTD.,  
Counterclaim Defendant.

---

\*\*CONTAINS CONFIDENTIAL PORTIONS - ATTORNEYS EYES ONLY\*\*

\*\*CONFIDENTIAL PORTION: PAGE 134 BOUND SEPERATELY\*\*

VIDEOTAPED DEPOSITION OF ZHI DING

DATE: Thursday, June 7, 2018  
TIME: 9:18 a.m.  
LOCATION: Quinn Emanuel Urquhart & Sullivan  
555 Twin Dolphin Drive  
Redwood Shores, California

Reported By: Lynne Ledanois, CSR 6811

Job No. 143284

Contains Confidential Portions  
Attorneys' Eyes Only

Page 2

A P P E A R A N C E S:

On Behalf of the Plaintiff:

SIDLEY AUSTIN

BY: NATHAN GREENBLATT, ESQ.

1001 Page Mill Road

Building 1

Palo Alto, California 94304

On Behalf of the Defendant:

QUINN EMANUEL URQUHART & SULLIVAN

BY: SAM STAKE, ESQ.

50 California Street

San Francisco, California 94111

Also Present: Marcus Majers, Videographer

Contains Confidential Portions  
Attorneys' Eyes Only

Page 3

1 I N D E X O F E X A M I N A T I O N

2 Examination by: Page

3 MR. STAKE 7

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 Concur IP, was to understand, establish to what  
2 extent different companies who own substantial  
3 number of self-declared SEP patents may be  
4 exaggerating or may be not purposely  
5 exaggerating, but maybe may have a different  
6 standard essential rate.

7 The landscape was trying to assess  
8 industry-wide what is the likelihood that a  
9 company's declared SEP portfolio may be  
10 essential, at what ratio, as opposed to the  
11 overall industry.

12 Q One aspect of your project in the TCL  
13 case was distinguishing between UE and  
14 infrastructure patents; is that correct?

15 A I do not believe there was an effort  
16 to distinguishing them. So in that process --  
17 in the landscape analysis that I conducted with  
18 the help of Concur IP, we limited the focus on  
19 patents with I believe what we call pure UE  
20 claims. I think that was the terminology.

21 Q Why did you do that?

22 A That was not my decision to make.  
23 Therefore, my report -- in the report I did  
24 not -- in my report to the Central District of  
25 California, U.S. court, I did not provide --

1 explain the rationale for doing so.

2           The standard essentiality analysis  
3 that I was involved in in the TCL case, we had a  
4 team, and in the beginning stage, Dr. Kakaes,  
5 who was the other expert retained by TCL, went  
6 to India and worked on site with attorneys  
7 representing TCL, and also worked with Concur IP  
8 team of engineers and analysts, and they  
9 established a -- the scope of the study.

10           And the scope of study was later on  
11 deemed to be acceptable to the client for  
12 whatever purpose that they used it for.

13           I helped to carry that out after  
14 Dr. Kakaes was preoccupied at a later stage with  
15 many other reports and other obligations.

16           Q       Why did they limit their study to pure  
17 UE patents?

18           A       I cannot -- I don't have an opinion on  
19 that. I think it's best to -- to see whether  
20 Dr. Kakaes explained that rationale in setting  
21 up the scope of the work.

22           I was informed later, when I joined  
23 the team, after the process of what we call a  
24 census has been completed. So we did a census,  
25 checked all the standard essential patents that

1     how that can be done to assess the quality ratio  
2     of each company's SEP portfolio.

3           Q       Did you do any work with Concur IP in  
4     connection with the work that you did in the  
5     Chinese litigation?

6           A       No, I did not.

7           Q       Now, the work you did with Concur IP  
8     in this case, can you take me through what  
9     exactly you used from the TCL litigation versus  
10    what was new?

11          A       Everything we did in this particular  
12    case for Huawei is strictly Huawei's -- I would  
13    say Huawei's asset of property. And everything  
14    we did for TCL, it is theirs. Therefore, you  
15    could ask Concur IP engineers how they did it  
16    and how we did it.

17                 But our basic principle is that every  
18    analysis we do for a different client will stay  
19    with that client. We don't reuse information  
20    written down from other cases to help another  
21    one.

22                 So every information we had was new  
23    for, say, if Concur was retained by us to do  
24    this analysis for Huawei, then we do a new one  
25    for Huawei. Now, to the extent they did an